

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH CHRISTOPHER ANTHONY
MARTELL,

Defendant.

Case No. 3:24-cr-58

Defendant's Motion to Continue Trial

-
1. Now comes the Defendant Joseph Christopher Anthony Martell by and through his attorney, Jessie L. VanCamp, as a member of the law firm of Olson, Juntunen, & Cobb, 802 Demers Ave., P.O. Box 5788 Grand Forks, ND 58206; and submits this Motion requesting that the Court continue his trial.
 2. Trial is scheduled to begin on February 24, 2026, in the U.S. District Court in North Dakota.
 3. The discovery in this case is voluminous, and there is a discovery Order in this case which prevents Counsel from providing the Defendant copies of any paper/printed discovery documents. Defendant filed a motion seeking access to a computer to review his discovery, which the Court granted.
 4. Defendant has now been able to review discovery. However, due to the time it took to secure a method of review and the amount of discovery in the case, Defendant has not had adequate time to discuss discovery with his counsel or to assist in his own defense. Several meetings have been held, but with significant

difficulty and a large amount of discovery has yet to be reviewed. Additionally, Defendant has now specifically requested certain motions be filed in his case.

5. Defendant's request is reasonable under the circumstances. Defendant is facing numerous charges for which, if convicted, he could be sentenced to substantial time in prison. These are serious charges, and this is a serious matter. In order for Defendant to assist the undersigned in his defense, he must have an opportunity to review his discovery and discuss the same with counsel in full.
6. Defendant therefore requests that this Court continue the scheduled trial to allow the Defendant the time needed to review this critical discovery with counsel.

Respectfully Submitted:

Dated: February 9, 2026

/s/ Jessie L. VanCamp
Jessie L. VanCamp ND #07234
Olson, Juntunen & Cobb, Ltd.
802 Demers Ave
Grand Forks, North Dakota 58201
Phone: 701-775-4688
Fax: 701-775-2440
Email: jess.vancamp@ojs-law.com